Report No.: 8003-053

Work Assignment No.: 019-2JZZ

Contract No.: 68-W9-0051 September 30, 1992

Updated: August 15, 1993

(MgpmL spriles)

Ms. Sandra Foose Pre - Remedial Assistant WAM Environmental Services Division U.S. Environmental Protection Agency Region II Edison, NJ 08837

RE: National Starch and Chemical Corporation, Environmental Priorities Initiative-Preliminary Assessment

Dear Ms. Foose:

After review of the available information for the Environmental Priorities Initiative - Preliminary Assessment of the National Starch and Chemical Corporation Facility, a recommendation of SITE EVALUATION ACCOMPLISHED (SEA) is proposed. The National Starch and Chemical Corporation Facility is located at 10 Finderne Avenue, Bridgewater, Somerset County, New Jersey and has the EPA ID No. NJD001519230. National Starch and Chemical Corporation conducts research and provides administration for the development of adhesives and sealants, plastic materials and resins, and industrial and food starches. The recommendation is based on the following findings:

- On August 15, 1980, National Starch and Chemical Corporation (Bridgewater Facility) submitted a Notification of Hazardous Waste Activity form (#8700-12) to the U. S. Environmental Protection Agency (USEPA) which Identified National Starch and Chemical Corporation's status as a Hazardous Waste Treatment, Storage, and Disposal Facility (TSDF) (Ref. No. 1). The USEPA acknowledged National Starch and Chemical Corporation's notification on October 9,1980 (Ref. No. 9). A General Information form and a Hazardous Waste Permit Application (USEPA Forms 3510-1 and 3510-3, respectively) were submitted on November 18, 1980 (Ref. Nos. 2,3).
- On June 25, 1981, a RCRA Generator inspection was conducted at the National Starch and Chemical Corporation facility by the New Jersey Department of Environmental Protection and Energy (NJDEPE). Sixty-seven 55-gallon drums containing ignitable wastes and waste solvents were observed in the drum storage area (Ref. No. 4). A TSDF inspection on June 27, 1981, revealed that National Starch and Chemical Corporation was planning to change their classification to Generator Only status (Ref. No. 5).
- On June 28, 1982, in a letter to the U.S. EPA, National Starch and Chemical Corporation requested that they be delisted as a hazardous waste storage facility. This request was based on the fact that National Starch and Chemical Corporation had protectively filed as a hazardous waste storage facility as a precautionary measure. National Starch and Chemical Corporation also stated in this letter that hazardous waste generated would be disposed of within the 90-day generator provisions (Ref. No. 6).
- In a letter dated March 11, 1983, the NJDEPE granted the delisting of the National Starch and Chemical Corporation's Bridgewater Facility from a TSDF to a Generator Only status. This deletion is applicable to NJDEPE's Hazardous Waste Regulations under NJAC 7:26-1 et seq (Ref. No. 7).

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On July 31, 1992, an on-site reconnaissance was conducted at National Starch and Chemical Corporation's Bridgewater Facility. During the reconnaissance, no obvious soil contamination was observed and there was no evidence of spills in the vicinity of the drum storage area. Hazardous waste is no longer stored in the former drum storage area. Presently, two dumpsters containing recyclable metals and wood are located in this storage area. The area consists of a paved surface bordered by a solvent storage shed on the north, paved access roads on the west and south, and a grass area on the east (Ref. No. 8).

USEPA was notified by NJDEPE of a former chemical dump area at the site used by Johns-Manville Company prior to National Starch and Chemical Corporation's purchase of the property in 1970 (Ref. Nos. 10; 11, pp. 1-2). The Johns-Manville Sales Corporation operated a research facility at the site from 1950 to 1970 (Ref. No. 11, pp. 1-2). Containers of waste materials were apparently packed with dirt in cement pipes which were subsequently buried in a clay lined pit, stabilized with suitable fill and covered with an impervious top (Ref. No. 11, pp. 1, 9). In May 1981, National Starch and Chemical excavated the entire contents of the dump area and had the wastes transported to off-site treatment, storage, and disposal (TSD) facilities through the State manifest system (Ref. Nos. 11, pp. 1-2, 9; 12; 13, pp. 1, 4-7). It was reported that all containers were intact upon excavation and there was no visual evidence of soil contamination (Ref. No. 11, pp. 1, 9). As this waste source no longer exists at the site and the relocation of the wastes meets the terms of a qualifying removal, the former dump area exhibits no significant effect on the overall site evaluation.

The above information, supported by the attached references, indicates that National Starch and Chemical Corporation of Bridgewater, New Jersey filed both a Notification of Hazardous Waste Activity form and a Hazardous Waste Permit Application as protective filing measures. The NJDEPE changed the RCRA permit status of National Starch and Chemical Corporation from a TSDF to Generator Only status. On-site inspection failed to uncover any indication of spills at the site and the fact that the drum storage area is no longer utilized for the storage of hazardous wastes additionally supports the abovementioned recommendation for the National Starch and Chemical Corporation site.

Very truly yours,

ANDREW CLIBANOFF SITE MANAGER

JOHN D. RIECKHOFF

PROJECT TASK LEADER

DENNIS STAINKEN, Ph.D.

WORK ASSIGNMENT MANAGER

This Report was conducted under the following USEPA Documentation Procedure

Guidance for Performing Preliminary
Assessments Under CERCLA
Publication 9345.0-01A

ATTACHMENT 1

Ms. Sandra Foose U.S. Environmental Protection Agency September 30, 1992 - Page 3

REFERENCES

Report No.: 8003-05-3

Rev. No.: 0

- 1. U.S. Environmental Protection Agency (EPA), Notification of Hazardous Waste Activity, EPA Form 8700-12, August 15, 1980.
- 2. U.S. EPA, General Information, EPA Form 3510-1, November 18, 1980.
- 3. U.S. EPA, Hazardous Waste Permit Application, EPA Form 3510-3, November 18, 1980.
- 4. U.S. EPA, RCRA Generator Inspection Form, National Starch and Chemical Corporation Site, June 25, 1981.
- 5. U.S. EPA, RCRA Treatment, Storage and Disposal Facility Inspection Form for National Starch and Chemical Corporation Site RCRA Inspection, June 27, 1981.
- 6. Letter from Robert Strain, Safety Administrator of National Starch and Chemical Corporation, to U.S. EPA Region II, June 28, 1982.
- 7. Letter from Frank Coolick, Chief, Bureau of Hazardous Waste Engineering, New Jersey Department of Environmental Protection to Robert Strain, Safety Administrator, National Starch and Chemical Corporation, March 11, 1983.
- 8. Field Notebook No. 82-0056, National Starch and Chemical Corporation, On-site Reconnaissance, Preliminary Assessment, Malcoim Pirnie, Inc., July 31, 1992.
- 9. U.S. EPA, Acknowledgement of Notice of Hazardous Waste Activity, EPA Form 8700-12B (4-80), October 9, 1980.
- 10. Letter from Donna van Veldhuisen, Bureau of Field Operations, New Jersey Department of Environmental Protection and Energy (NJDEPE), to Sandy Foose, USEPA Region II, March 29, 1993.
- 11. Preliminary Assessment Report, Johns-Manville Sales Corporation, Bridgewater, Somerset County, New Jersey, Hazardous Site Mitigation Agency (HSMA), NJDEPE, September 27, 1984.
- 12. Project Note: To National Starch and Chemical Corporation file, from Andrew Clibanoff, Malcoim Pirnie, Inc., Subject: Manifests documenting removal of wastes from site, August 5, 1993.
- 13. Project Note: To National Starch and Chemical Corporation file, from Andrew Clibanoff, Malcolm Pirnie, Inc., Subject: Results of File Search for Additional Information Concerning the Waste Disposal Area, August 5, 1993.
- 14. Malcolm Pirnie, Inc. Interoffice Correspondence from Andrew Clibanoff to John Rieckhoff (both of Malcolm Pirnie, Inc.), Subject: National Starch and Chemical Site Status, August 5, 1993.

REFERENCE NO. 1

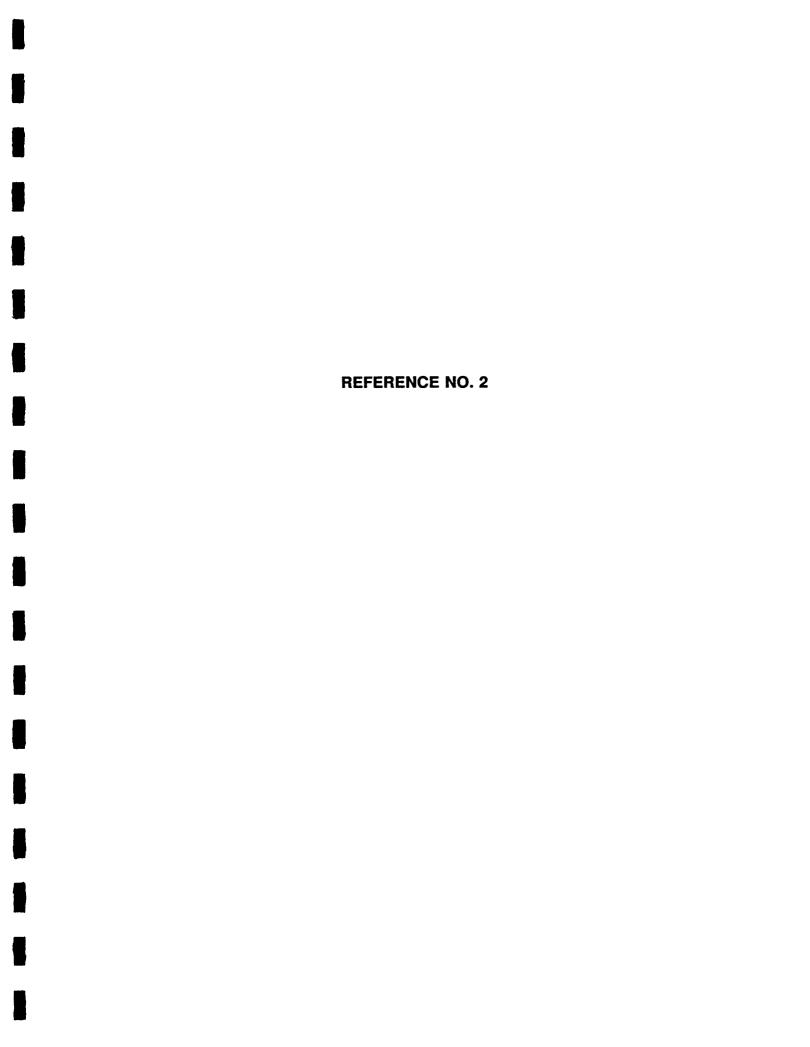
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SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE CODE
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Allegan and the Control of the control of the first of the first of the control o If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total ennual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number-that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.
- نا على ال MINO:

AMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds Fryear of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill. 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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N J D O O 1 5 1 9 2 3 0 3 6	$F6:\frac{\pi}{56}$	
V. FACILITY DRAWING		
All existing facilities must include in the space provided on	page 5 a scale drawing of the facility (see instructions for i	more detail).
I. PHOTOGRAPHS		
All existing facilities must include photographs (aeri treatment and disposal areas; and sites of future stores.)	al or ground—level) that clearly delineate all existing the street of th	ng structures; existing storage,
II. FACILITY GEOGRAPHIC LOCATION	age, treatment or disposal areas (see mistractions re	, more detail).
LATITUDE (degrees, minutes, & seconds	LONGITUDE (de	grees, minutes, & seconds)
4 0 3 3 2 2 0 65 66 67 68 69 71	0 7 4	3 4 4 3 0
	sted in Section VIII on Form 1, "General Information",	place an "X" in the box to the left and
B. If the facility owner is not the facility operator as li	sted in Section VIII on Form 1, complete the following i	tems:
1. NAME OF FACIL	ITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
NATIONAL STARCH & CHEMICAL CORPO		2 0 1 6 8 5 5 0 2 4
G	4. CITY OR TOWN	5. ST. 6. ZIP CODE
10 FINDERNE AVENUE	G BRIDGEWATER	NJ - 08807
IX. OWNER CERTIFICATION	45 15 16	40 41 42 47 - 51
certify under penalty of law that I have personally cuments, and that based on my inquiry of those in bmitted information is true, accurate, and complete including the possibility of fine and imprisonment.	dividuals immediately responsible for obtaining the e. I am aware that there are significant penalties fo	e information, I believe that the or submitting false information,
I F. Peck - Vice President Mfg.	B. SIGNATURE	C. DATE SIGNED
Adhesives & Resins Div.	Llr O ack	11/18/80
OPERATOR CERTIFICATION		
certify under penalty of law that I have personally documents, and that based on my inquiry of those in submitted information is true, accurate, and complete cluding the possibility of fine and imprisonment.	dividuals immediately responsible for obtaining th	e information, I believe that the
NAME (print or type)	B. SIGNATURE	To page 50000
	J. J.GRATURE	C. DATE SIGNED
•		• •
Form 3510-3 (6-80)	PAGE 4 OF 5	CONTINUE ON PAGE

CONTINUE ON PAGE 5 PAGE 4 OF 5

REFERENCE NO. 4

RCRA GENERATOR INSPECTION FORM

DON'T KNOW

•	•		10	
COMPANY NA	ME: National Starch + Chem Corp	EPA I.D. NUMBER:	NEW TORK	Methor Co.
COMPANY AL	DDRESS: 10 Finderne Aue	,	1	10/0
	Bridgewater.			0,
	ONTACT OR OFFICIAL:	INSPECTOR'S NAME:		
Chuck	Eagelton train	Bob Dante		
TITLE: Me	anager of Engineering Securices	BRANCH/ORGANIZATION:		•
-Sat	fety coordinator	NTOFF		
CHECK IF F	FACILITY IS ALSO A TSD	DATE OF INSPECTION:	•	
FACILITY		6/25/81	YES	<u>w</u>
(1) Is th	nere reason to believe that the facil e on site?	lity has hazardous	<u>/</u>	
	if yes, what leads you to believe it theck appropriate box:	is hazardous waste?		
19 c	Company admits that its waste is haza inspection.	ardous during the		·
	Company admitted the waste is hazardo notification and/or Part A Permit App			
// T h	the waste material is listed in the reazardous waste from a nonspecific so	regulations as a ource (§261.31)		
Th	he waste material is listed in the r azardous waste from a specific sourc	regulations as a re (§261.32)		
/A T	the material or product is listed in iscarded commercial chemical product	the regulations as a (§261.33)		
0	PA testing has shown characteristics orrosivity, reactivity or extraction in has revealed hazardous constituent nalysis report)	procedure toxicity.		
Co	ompany is unsure but there is reason aterials are hazardous. (Explain)	to believe that waste		

DON'T

KNOW

<u>w</u>

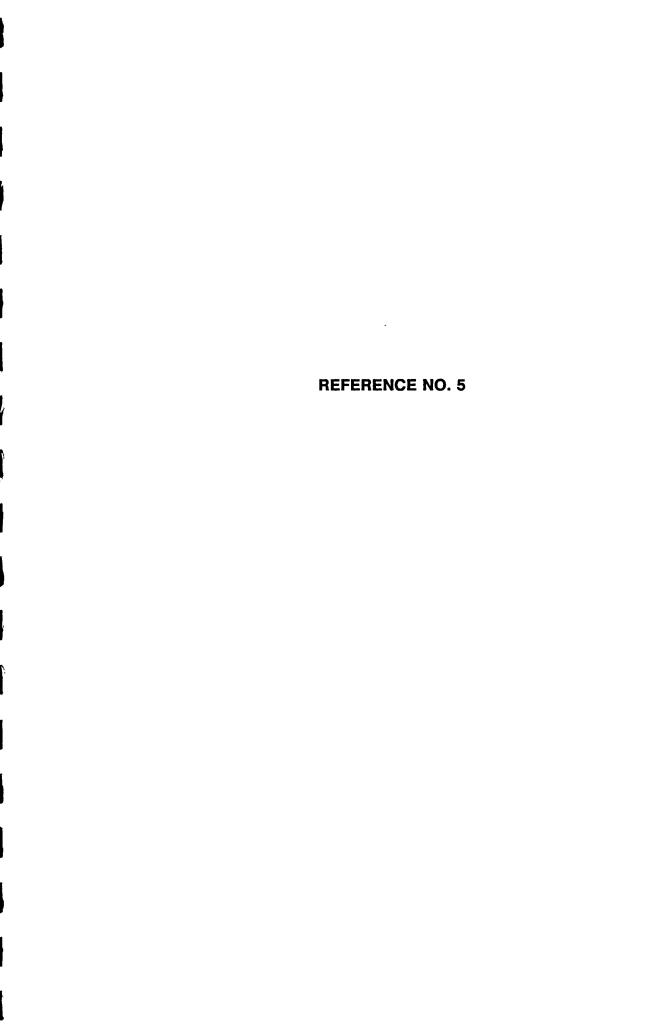
	b.	Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials? Please explain: Company knows Wastes are not hazardous.
	c.	Identity the hazardous wastes that are on-site, and estimate approximate quantities of each. Ignitable wastes Dool : 67,5543
	đ.	Describe the activities that result in the generation of hazardous waste. laboratory operations and testing of other products Adhesises sesins and starches.
(2)	Is	hazardous waste stored on site?
	a.	What is the longest period that it has been accumulated?
	b.	Is the date when drums were placed in storage marked oneach drum?
(3)		hazardous waste been shipped from this facility since vember 19, 1980?
	a.	If "yes," approximately how many shipments were made?
(4)	ped	proximately how many hazardous waste shipments off site have en made since November 19, 1980? 3
	a.	Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?
	b.	If "no" or "don't know," please elaborate.

			<u>YES</u>	<u>NO</u>	KNOW
C	. DX	pes each manifest (or a representative sample) have ne following information?	•		
	-	a manifest document number			
	-	the generator's name, mailing address, telephone number, and EPA identification number	<u> </u>		
	_	the name, and EPA identification number of each transporter	_		
	-	the name, address and EPA identification number of the designated facility and an alternate facility, if any:	_		-
	-	a description of the wastes (DOT)	<u>'</u>		
	-	the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	<u>V</u>	/	
	_	a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	_		
(5) V	were of th	there any hazardous wastes stored on site at the time ne inspection?	_/	/_	
ć	a.]	If "yes," do they appear properly packaged (if in con- tainers) or, if in tanks, are the tanks secure?			
] - نب		If not properly packaged or in secure tanks, please explain.		٠ .	
	c.	Are containers clearly marked and labelled? Not at this time			/_
		Do any containers appear to be leaking?		<u> </u>	/_
	e.	If "yes," approximately how many?			

- *(6) Has the generator submitted an annual report to EPA covering , UA the previous calendar year?
 - a. How do you know?
 - (7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?
 - a. If "no," have Exception Reports been submitted to EPA covering these shipments?
 - (8) General comments.

 The facility is clean. Their were some rusted drums on site which will be repacked by June 29. The drums were not leaking

^{*} The effective date for this requirement is March 1, 1982.



RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM FOR TSD FACILITIES ONLY schem Corp EPA I.D. Number: COMPANY NAME: National Starch NJD001519230 COMPANY ADDRESS: 10 Finderne Auc Bridge water COMPANY CONTACT OR OFFICIAL: OTHER ENVIRONMENTAL PERMITS HELD Bob Steamin BY FACILITY: AIR TITLE: GPity Coordinator // OTHER DATE OF INSPECTION: INSPECTOR'S NAME: Bob Darte 6/27/81 BRANCH/ORGANIZATION: TIME OF DAY INSPECTION TOOK PLACE: NSDEP (1) Is there reason to believe that the facility has hazardous waste on site? 9<5 If yes, what leads you to believe it is hazardous waste? Check appropriate box: Company admits that its waste is hazardous during the inspection. Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application. // The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31) The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32) The material or product is listed in the regulations as a discarded commercial chemical product (§261.33) EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report) Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) DON'T b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials? Please explain: Company Knows Identify the hazardous wastes that are on-site, Ignitables 67,55 gellandrums and estimate approximate quantities of each. solvents (2) Does the facility generate hazardous waste? (3) Does the facility transport hazardous waste? Does the tacility treat, store or dispose of hazardous waste?

A STATE OF THE PROPERTY OF THE

FAMILIET, STORAGE AND DISPOSAL FACILITY INSPECTION FORM.
FOR TSD FACILITIES ONLY

VISUAL OBSERVATIONS

שינצעו

(5)	SITE SECURITY (\$265.14)	YES	<u>00</u>	KINON
	a. Is there a 24-hour surveillance system?	1		
	b. Is there a suitable barrier which completely surrounds the active portion of the facility?	es		
	c. Are there "Danger-Unauthorized Personne) Keep Out" signs posted at each entrance to the facility?	<u> </u>		<u> </u>
			٠.	
· (6)	Are there ignitable, reactive or incompatible wastes on site? (§265.27)	_/	_	
	a. If "YES", what are the approximate quantities?	55	50//	on drums
,	b. If "YES", have precautions been taken to preve accidential ignition or reaction of ignitable or reactive waste?	ent —	_	
	c. If "YES", explain stored in secure drums			• .
•	d. In your opinion, are proper precautions taken that these wastes do not:	so		
	- generate extreme heat or pressure, fire or explosion, or violent reaction?	_\(\alpha \)	/_	
	- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	_/_	/ <u>^</u> _	
	 produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions? 	: ســ		
	- damage the structural integrity of the device or facility containing the waste?			
	- threaten human health or the environment?	_\u03b4		

Please explain your answers, and comment if necessary.

- e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility? /// o
- (7) Does the facility comply with preparedness and prevention requirements including maintaining: (\$265.32)

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,		_	YES	<u>C11</u>	HHOW	
	- an	internal communications or alarm system?			<u> </u>	
	– a as	telephone or other device to summon emergency sistance from local authorities?	_/			
	- pc	ortable fire equipment?	V	<u></u>		
	ad	dequate aisle space?	V			
	re	n your opinion, do the types of wastes on site equire all of the above procedures, or are some of needed? Explain. For the types of waste	and	am	rount	,
,		on site no internal is needed in my of	phio	i,		
					•	
•	In yo	our opinion, do the types of wastes on site requiedures, or are some not needed? Explain. < e.e.	re all	of ti ⊸e	he above .	
		·				
(8)	mon	e you inspected to verify that the groundwater itoring wells (if any) mentioned in the facility undwater monitoring plan (see no. 19 below) are perly installed?	s <u>N</u> F	2 — 2	<u></u>	
	•		100		 .	
	If	you have, please comment, as appropriate.				
(9)	. ∞	there any reason to believe that groundwater ontamination already exists from this facility? "YES", explain.	, 	- Ł		
		you believe that operation of this facility ay affect groundwater quality?		V		
	c. If	f "YES", explain.				
						٠.
		RECORDS INSPECTION				
(10	an	s the facility received hazardous waste from off-site source since Nov. 19, 1980 (effective te of the regulations)?	<u>Ñ</u> I	9 _		
	а.	If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?	אַן	H _		
-	b.	Now many post-November 19 manifests does it have? (If the number is large, you may estimate)			,	
	c.					
		- a manifest document number	<u>_</u> _		·	
		· **				

This requirement applies only after November 19, 1981.

	\cdot		
4.	Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics?		
	If "YES", explain.		
5.	Are there any leaks, failures or is there any deteriorization in the impoundments?		
	If "YES", explain.	 ,	
		e e e e e e e e e e e e e e e e e e e	
**	of surface		
· 6•	Give the approximate size of surface impoundments (gallons or cubic feet).		
		P	
	WASTE PILES (\$265.250)	÷	
1.	Is the waste pile protected from wind _erosion?		
	a. Does it appear to need such protection?	<u> </u>	
	b. Explain what type of protection exists.	*	
_	Does it appear that incompatible wastes are		
2.	being stored in the same waste pile? If "YES", explain.		
3	Is leachate run-off from a pile a hazardous waste?		
	If "YES", explain this determination and answer (a) and (b) below.		
	a. Is the pile placed on an impermeable base that is compatible with the waste?		
	b. Is the pile protected from precipitation and run-on?		
. 4	In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.	· · · · · · · · · · · · · · · · · · ·	
	Are they placed on an existing pile so that they no longer meet the definition of ignita or reactive waste? Please explain.	mble	•
-	5. How many waste piles are on site, and appromately how large are they?	oxi-	
	LAND 'IRFATMENT (§265.270)	·	-
	 Can the facility operator demonstrate that the hazardous waste has been made less of non-hazardous by biological degradation or chemical reactions occurring in or on the soil? 	· .	
	Please explain.	1	

~<u>,~~</u>,

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*2.	Is run—on diverted away from the active portions of the land treatment facility?	-			
* 3.	Is run-off collected?	 -		_	
4.	Are food chain crops being grown on the facility property?	-		<u>.</u> .	
	a. If "YES", can the facility operator document that arsenic, lead and mercury:				
	 will not be transferred to the crop or ingested by food chain animals or 				
:	 will not occur in greater concentra- tions in the crops grown on the land treatment facility than in the same crops grown on untreated soils. 			, 	-
	b. Has notification of the growing of the food chain crops been made to the Regional Administrator?				
5.	Is there a written and implemented plan for unsaturated zone monitoring?	-			
6.	Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?	<u> </u>		_	
7.	Do the closure and post-closure plans address:				
~	a. control of migration of hazardous wastes into the groundwater?			<u>;</u>	
	b. control of run-off, release of airborne particulate contaminants?				
•	c. compliance with requirements for the growth of food-chain crops (if they are present)?				
8.	Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.		•		
9 .	Are incompatible wastes placed in the same land treatment area? If "YES", explain.		—		
10.	What is the area of the land receiving hazardous waste treatment?				
	<u>LANDFILLS</u> (§265.300)				
11.	Is run-on diverted away from the active portions of the landfill?				
†2.	Is run-off from active portions of the landfill collected?				
•	•				

^{*} Effective date for these requirements is May 19, 1981.

[†] These requirements are effective November 19, 1981.

	11	YES	NO	KNOW
			-	· .
	s waste which is subject to wind dispersal controlled?	-		
E	xplain.	-		
. r	coes the owner/operator maintain a map with:		•	
-	the exact location and dimensions of each cell	· · ·		<u></u>
` -	the contents of each cell and approximate location of each hazardous waste type			· .
	the closure and post-closure plans address:		٠,	•
-	control of pollutant migration via ground water?	<u></u>		
	control of surface water infiltration?	· ·		
	- prevention of erosion?	·		
	Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.	<u> </u>		
	· · · · ·			•
7.	Are precautions taken to insure that incompati	ible wa	stes	
:	are not placed in the same landfill cell? If"NO", explain.			
8.	Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",		· · ·	
	a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?			
	b. Is the waste treated and stabilized so that free liquids are no longer present?			
'9 .	Are containers holding liquid waste or waste containing free liquids placed in the landfill?			. <u></u> -
10.	Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?			
	If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?			-
11.	What is the approximate area of the hazardous waste landfill?		٠	

* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMEN	T
(§§265.340 and 265.379)	_

DON'T TES NO KNOW

	•				
1.	What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?				
2.	Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.			<u> </u>	v
3.	Has waste analysis been performed (and written reco	orde ke	ant) t	^	
	include:	JEGS AC	.pc, c		
	- heating value of the waste				
	- halogen content				
	- sulfur content		_		
	- concentration of lead		_	•	
	- concentration of mercury				
	E: Waste analysis need not be performed on each was if there are documented data available to show was a second or show to the control of	ste loa	ad if charac	teristi	
OT:	that do not vary. If there are such documented check here				cs
4.	that do not vary. If there are such documented				cs
	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before	data a	availa		cs
4.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every	data a	availa		cs
4.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for:	data a	availa		cs
4.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for: - waste feed	data a	availa		cs
4.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for: - waste feed - auxiliary fuel feed - air flow	data a	availa		cs
4.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for: - waste feed - auxiliary fuel feed	data a	availa		cs
4.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for: - waste feed - auxiliary fuel feed - air flow - incinerator temperature - scrubber tlow	data a	availa		cs
4.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for: - waste feed - auxiliary fuel feed - air flow - incinerator temperature - scrubber flow - scrubber pH	data a	availa		cs
5.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for: - waste feed - auxiliary fuel feed - air flow - incinerator temperature - scrubber tlow - scrubber pH - relevant level controls	data a	availa		cs
5.	that do not vary. If there are such documented check here	data a	availa		cs
5.	that do not vary. If there are such documented check here Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes? Did it appear during your inspection that there was monitoring and inspection by owner/operator every during hazardous waste incineration for: - waste feed - auxiliary fuel feed - air flow - incinerator temperature - scrubber tlow - scrubber pH - relevant level controls	data a	availa		cs

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	-	-					
	a.	If "YES", what is being burned? (only burning or detonation of explosives is permitted)		-			
		•		-			
	b.	If open burning or detonation of exp place, approximately what is the dis burning or detonation to the proper	stance f	rom the open		٠	DON'T
•	٠			•	YES	<u>NO</u>	KNOW
6.	pro	es the incinerator appear to be operatoperly? (Do emergency shutdown control system alarms seem to be in good woder?) Please explain.	ols				
					-		
	a.	Is there any evidence of fugitive e	missions	s?			- —
7.	by	the residue from the incinerator tre the owner as a hazardous waste? ease explain.	ated		_		
		-		•			٠, ,
8.		tat types of air pollution control device installed on the incinerator?	vices (i	fany)	•		
٠.		CHEMICAL, PHYSICAL AND BIOLOGICAL TR	EATMENT	(§265.400)			
1.	si	pes the treatment process system show igns of ruptures, leaks, or corrosion lease explain.	any ?	- - -		•	
2.	Is	s there a means to stop the inflow of ontinuously-fed hazardous wastes?					
3.	Is ir	s there ignitable or reactive waste f nto the treatment system?	ed				
	f:	f "YES", has it been treated or prote rom any material or conditions which ause it to ignite or react? If so, explain how.	cted may		_		
	t	are the incompatible wastes placed in the same treatment process? of "YES", explain.	•				
5	. D	Describe the treatment system at this	facilit	у.			

خ:

	_ :	the generator's name, mailing address, telephone number, and EPA identification number	<u> </u>
		the name, and EPA identification number of each transporter	- -
•		the name, address and EPA identification number of the designated facility and an alternate facility, if any;	<u> </u>
	-	a DOT description of the wastes	<u> </u>
•	-	the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	<u> </u>
	. -	a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	·
`	_ <u>=</u> - }	are there any indications that unmanifested hazardous wastes have been received since hovember 19, 1980? If YES, explain.	<u>NA</u>
- (11)	plan and	the facility have a written waste analysis specifying test methods, sampling methods sampling frequency? (\$265.13)	
•		Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary All wastes are basically the same Company treats all waste as hazardous Don't Know	· · · · · · · · · · · · · · · · · · ·
	ь.	Does hazardous waste come to this facility from off-site sources?	
	c.	If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	- <u>NA</u>
(12)	INS	PECTIONS (\$265.15) National Starch is mat there classification to)	king plans to change
. (==/	a.	Does the facility have a written inspection they schedule?	are.
-	b.	Does the schedule identify the types of problems to be looked for and the frequency for inspections?	
-	c.	Does the owner/operator record inspections in a log?	
	d.	Is there evidence that problems reported in the inspection log have not treen remodied? If "YES," please explain.	

MOKE

YES NO

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	•	••~	.9	

13)	PERS	O:VI	EL TRAINING (\$265.16)
	a.	Is	there written documentation of the following:
		-	job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?
-		-	type and amount of training to be given to personnel in jobs related to hazardous waste management?
••		-	actual training or experience received by personnel?
(14)	for fir ha	res zar	the facility have a written contingency plan mergency procedures designed to deal with , explosion or any unplanned release of dous waste? .51)
-	-a.		es the plan describe arrangements made with cal authorities?
	b. ==	to	s the contingency plan been submitted local authorities?
		HC	w do you know? The company Adimitted it was
	c.		mes the plan list names, addresses, and mone numbers of Emergency Coordinators?
	đ.		pes the plan have a list of what emergency puipment is available?
	e.		s there a provision for evacuating facility ersonnel?
	f.		as an Emergency Coordinator present or on all at the time of the inspection?
(15)			the owner/operator keep a written operating of with: (§265.73)
	-		description of wastes received with methods didates of treatment, storage or disposal?
•	-	10	cation and quantity of each waste?
	·	tr	tailed records and results of waste analysis and eatability tests performed on wastes coming into the cility?
÷	-	of	tailed operating summary reports and description all emergency incidents that required the implementa- on of the facility contingency plan?
<u>*</u> (16) D	oes ost	the facility have written closure and ———————————————————————————————————
	a	•	Does the written closure plan include:
			- a description of how and when the facility will be partially (if applicable) and

^{*} Effective date for this requirement is May 19, 1981.

the limit of the waste mangement area?

at the limit of the waste management area?

b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient

This section applies only to disposal facilities.

Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT -		DISPOSAL		
Waste Pile p. 9	Tank p. 8	I	Landfill pp. 10-11		
Surface Impoundment p.	8 Surface Impoundment pp.	. 8 <u>.</u> –9 1	Land Treā P	tment p. 9, 10	
Container p. 7	Incineration pp. 12-13		Surface Impoundment p. 8		
Tank, above ground p.	8 Thermal Treatment\pp.		Other	•	
Tank, below ground p.	8 Land Treatment pp. 9-1		Other		
Other	Chemical, Physical p. and Biological Treatment (other than in tanks, surface important or land treatment facilities)	ound-	<u>res</u> 110	DON'T KNOW	
· =	Other	1			
	CONTAINERS (\$265.170)				
 Are there any lead it "YES", explain Are there any compose of leaking? If "YES", explain 	stainers which appear in da	nger	<u></u>	<u> </u>	
3. Do wastes appear materials?	compatible with container		V_		
4. Are all contained	rs closed except those in (ise?	<u> </u>	· —	
or stored in a m	pear to be opened, handled anner which may rupture the use them to leak?	2			
6. How often does to container storage	he plant manager claim to e e areas? daily	inspect			
7. Does it appear t stored in close If "YES", explai	hat incompatible wastes are proximity to one another?	e being	<u>_</u>	<u>/</u>	
8. Are containers h wastes located a the facility's p	oolding ignitable or reacti at least 15 meters (50 feet property line?	ve) from			

What is the approximate number and size of containers with hazardous wastes? (7) \$ 55 gallon drums

•	TANKS (5265.190)	-	YES	<u>041</u>	KNOW T
۱.	Are there any leaking tanks? It "YES", explain.		<u>:</u>		
2.	Are there any tanks which appear in danger of leaking. If "YES", explain.				· .
3.	Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.				
	Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?				
5.	Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?	Ž.			·
6.	Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.				
	·			12	
7.	How often does the plant manager claim to inspect container storage areas?				
8.	a manner which protects them from a source of ignition or reaction?				
	If "YES", explain.				
9.				•	
9.	What is the approximate number and size of			.	
9.	What is the approximate number and size of tanks containing hazardous wastes? SURFACE IMPOUNDMENTS (§265.220)			——————————————————————————————————————	
	What is the approximate number and size of tanks containing hazardous wastes? SURFACE IMPOUNDMENTS (§265.220) Is there at least 2 feet of freeboard in the impoundment?			— —	
1.	What is the approximate number and size of tanks containing hazardous wastes? SURFACE IMPOUNDMENTS (§265.220) Is there at least 2 feet of freeboard in the impoundment? Do all earthen dikes have a protective cover to preserve their structural integrity?	,		· —	· —

: ±

REFERENCE NO. 6



BRIDGEWATER, N.J. ◆ 201-685-5000 ALL MAIL TO BOX 6500, BRIDGEWATER, N.J. 08807 FINDERNE AVE.

RITER'S DIRECT DIAL NUMBER

CABLE ADDRESS . NASPROD, BRIDGEWATERNEWJERSEY

TWX • 710 • 480 • 9240

E.P.A. Region II New York, N.Y. 10007

26 Federal Plaza

June 28, 1982

I.D. # NJD001519230

Dear Gentlemen:

This letter serves as a formal request to remove National Starch and Chemical's Bridgewater location as a licensed hazardous waste storage site. We will maintain our generator status but are dropping the interim storage filing since the original filing was precautionary and is no longer applicable. The amended 40 CFR Part 262.34 (1/11/82) which could allow an extension to the 90 day accumulation on a caseby-case basis had provided for the potential problems we anticipated. We are therefore, following the 40 CFR 1/11/82 recommendation "generator are encouraged to withdraw protective filings by contacting their EPA Regional Offices". Any hazardous waste generated at our site will be disposed of within the regular 90 day generator provisions.

Robert W. Strain

1-5

REFERENCE NO. 7



Joel Solumbia

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON DIRECTOR LINO F. PEREIRA
DEPUTY DIRECTOR

March 11, 1983

Robert W. Strain
Safety Administrator
National Starch & Chemical Corporation
Box 6500
Bridgewater, NJ 08807

RE: Facility Operating Status

Dear Sir:

The Bureau of Hazardous Waste Engineering has reviewed your company's response to the Notice of Violation, Failure to Submit Annual Report. The Bureau finds that the response contains adequate information to determine the operating status of this facility with respect to N.J.A.C. 7:26-1 et seq., the New Jersey Hazardous Waste Management Regulations. The Bureau has determined that the company's hazardous waste treatment, storage or disposal facility as delineated in the company's RCRA Part A application and identified by the following EPA ID Number:

EPA ID NO. NJD001519230

has been excluded from regulations under N.J.A.C. 7:26-1.1 et seg. because your facility accumulates hazardous waste on-site for less than 90 days. This exclusion classifies your facility solely as a generator provided the following conditions are complied with:

- 1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
- 2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
- The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
- 4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

 New Jersey Is An Equal Opportunity Employer



- 5. For bulk accumulation of dry hazardous waste materials, the waste pile is managed according to the following:
 - (i) The waste pile is no larger than 200 cubic yards; and
 - (ii) The pile shall be placed on an impermeable base that is compatible with the waste; and
 - (iii) Run-on shall be diverted away from the pile; and
 - (iv) Any leachate and run-off from the pile must be collected and managed as a hazardous waste.

This written acknowledgement of the exclusion of the above identified facility from N.J.A.C. 7:26-1 et seg. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occuring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirments of N.J.A.C. 7:26-1 et seq. for existing facilities" which would include the TSD facility annual report. It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

As a result of the conclusions previously made, the Notice of Violation entitled "Failure to Submit Annual Report" signed by Mr. David Shotwell is rescinded and need not be complied with.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,

Frank Coolick, Chief

Bureau of Hazardous Waste Engineering

FC: jb

cc Dave Shotwell NJDEP, Division of Waste Management

Tom Taccone USEPA, Region II

REFERENCE NO. 8

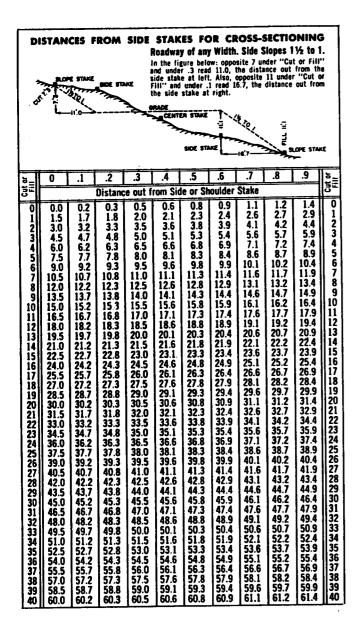
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National Starch & Chemical Corp.
Bridgewater, NJ.

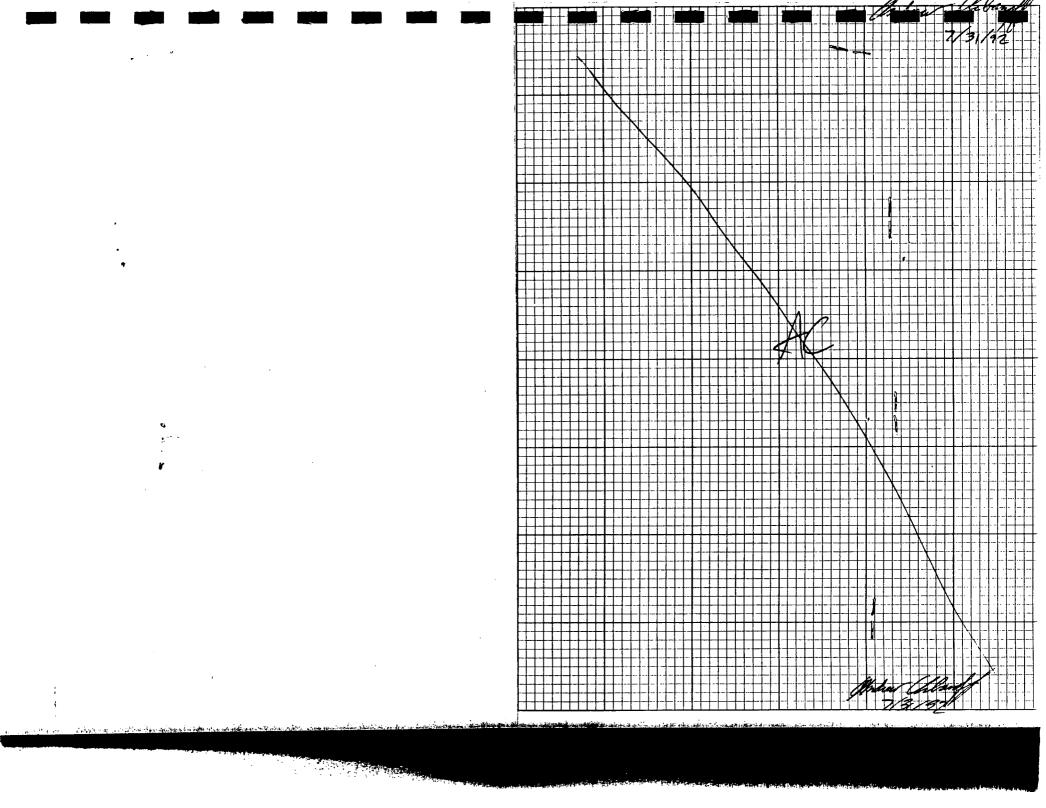
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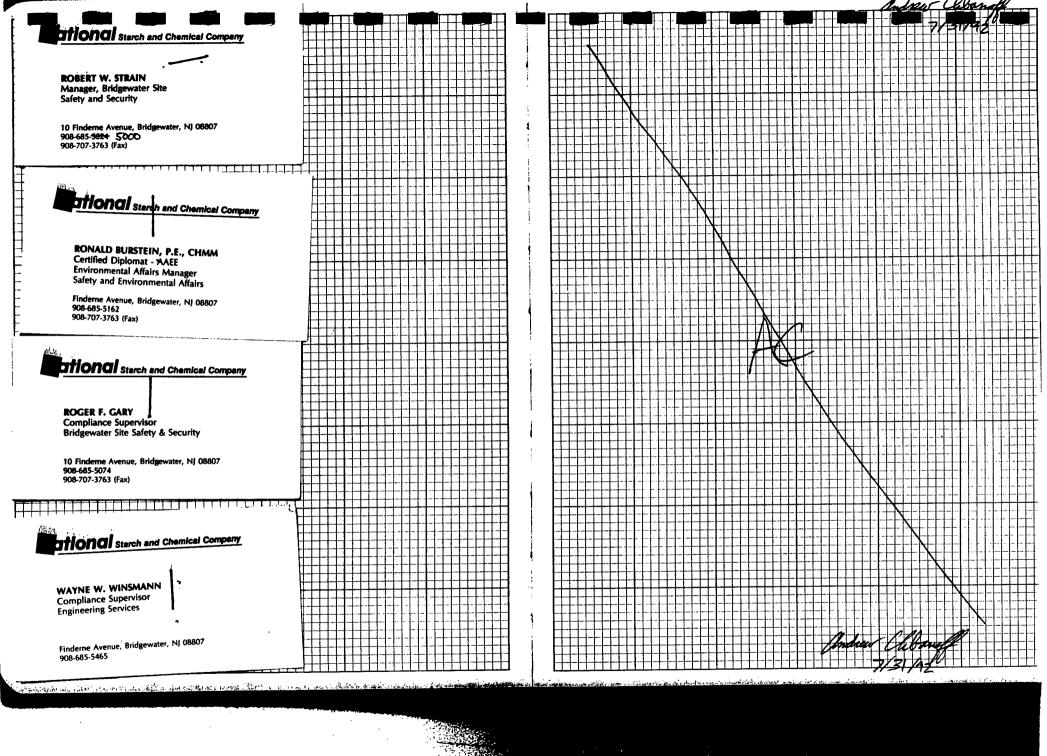
Site Manager

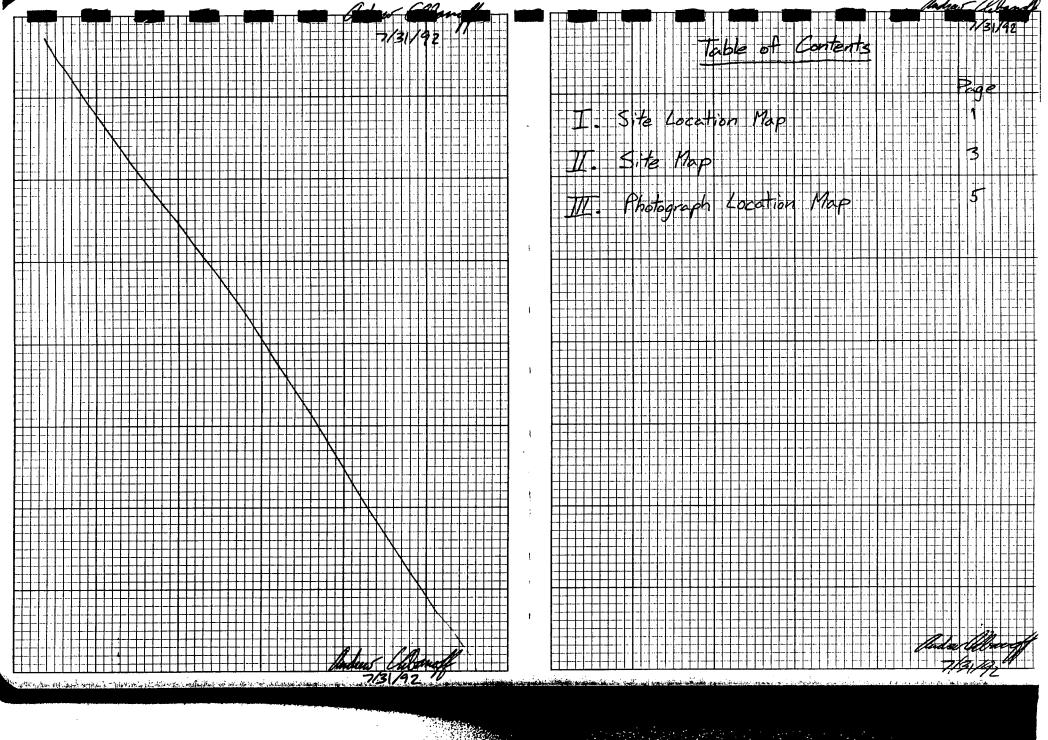
Andrew Clibanoff

The paper in this book is made of 50% high grade rag stock with a WATER RESISTING surface sizing.

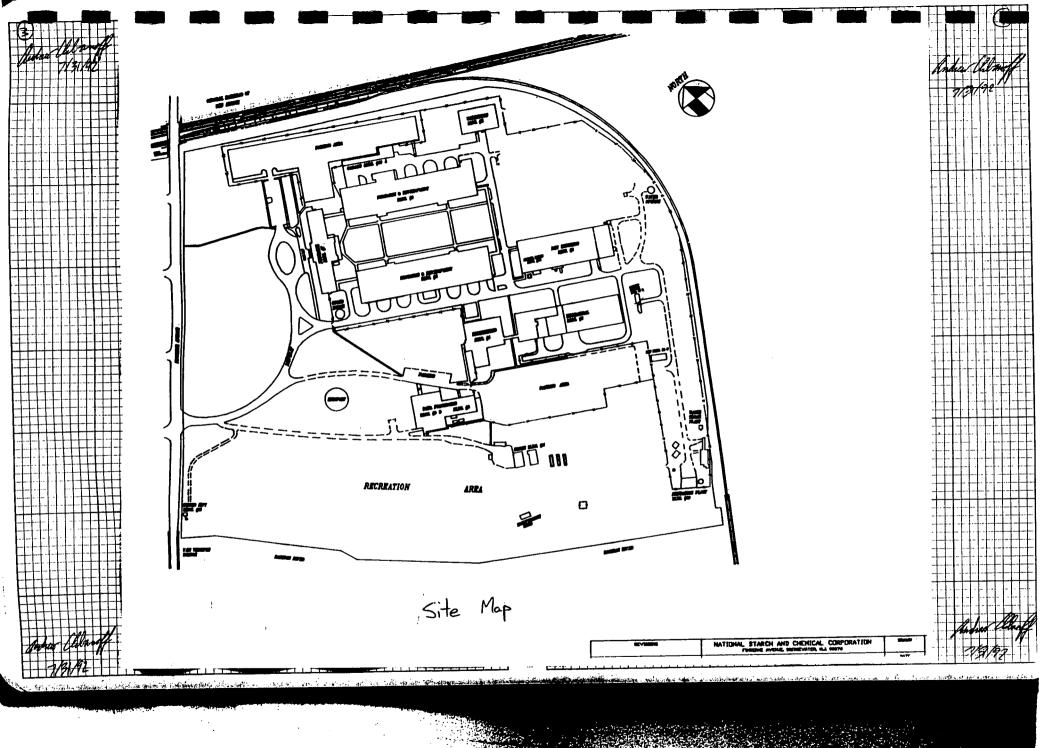
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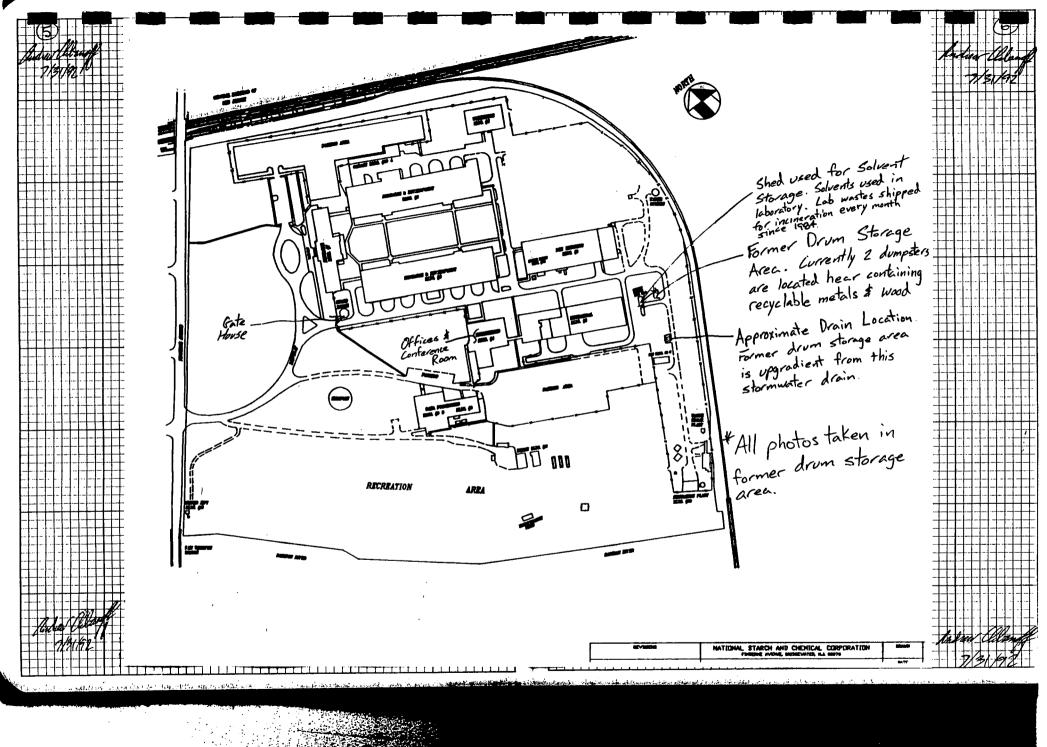






STARCH BOUND BROOK, N. DATIONAL BRIDGEWATER SCALE 1:24000 PROPERTY NJD001519230





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REFERENCE NO. 9



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

WATIOWAL STARCH & CHEMICAL CORP.
10 FINDERES AVENUE
BRIDGEWATER.
10 PIWDERES AVENUE
BRIDGEWATER
10 08807

10 FINDERES AVENUE
BRIDGEWATER
11 08807

REFERENCE NO. 10



State of New Jersey **Department of Environmental Protection and Energy**

Division of Responsible Party Site Remediation **CN 028** Trenton, NJ 08625-0028

Scott A. Weiner Commissioner

Karl J. Delaney Director

March 29, 1993

Ms. Sandy Foose Environmental Services Division U.S. Environmental Protection Agency Region II Edison, New Jersey 08837

Dear Sandy:

We recently received an Environmental Priorities Intiative -Preliminary Assessment (PA) for the National Starch and Chemical Corporation Facility (EPA ID No. NJD001519230) located at 10 Finderne Avenue, Bridgewater, Somerset County, New Jersey. Upon reviewing this PA it came to my attention that this report is seriously deficient as the site was formerly the Johns-Manville Sales and Research Facility (EPA ID No. 980530117). Enclosed is information concerning a former chemical dumps areas used by Johns-Manville and cleanup activities conducted by National Starch in The NJDEPE is requesting that this information be reviewed and evaluated when considering the need for further action at this site.

If you have any questions concerning this matter, please do not hesitate to call me at (609) 584-4280.

Very truly yours

Donna J. van Veldhuisen Bureau of Field Operations

Site Assessment Section

enclosure

REFERENCE NO. 11



Preliminary Assessment

Johns-Manville Sales Corporation Finderne Avenue Bridgewater/Somerset County New Jersey Johns-Manville Sales Corporation Bridgewater Twp./Somerset County New Jersey

The Johns-Manville Sales Corp. (J-M) once operated a research facility on property which is presently owned by the National Starch Corp. in Bridgewater Twp., Somerset County. This research facility was used by J-M from 1950 to 1970. In 1970, National Starch purchased the property.

During operation of this property, by J-M, a waste pit was utilized for disposal of asbestos and chemical wastes from the research laboratories. In May 1981, National Starch excavated and emptied the landfill and had the wastes transported to proper disposal areas off site via the State manifest system.

During a follow-up inspection in July 1981, NJDEP officials found the area to be secure. A low priority rating is given this site.

Submitted by: Anne De Cicco

Environmental Specialist

NJDEP-HSMA

RCRA 3012 Project

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EPAFORM 2070-12 (7-81)

III. Waste Type, 03 Comments (Continued)

cleaned the pit out and disposed of the wastes in accordance with the manifest system.

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V. SOURCES OF INFORMATION ICH ADVANCE INTERPRETATION IN			

sentatives of the State, Div. of Water Resources, in July 1981 revealed that this area appeared to be secure; National Starch was found to be operating their facility in an environmentally sound fashion. Based on this information a low priority is given this site.

7

Files

Joseph M. Mikulka, Chief, Region IV

National Starch, Bridgewater Township

AUG 7 1981

On July 28, 1981, I met with Mr. Charles Eagleton and Mr. Robert Strein of National Starch, concerning the organic contamination of their potable water wells.

I advised these gentlemen that the Division had two major concerns at this time:

- That the wells were not being used for potable purposes.
- 2) That none of the operations on Matienal Starch's property were contributing to this ground water pollution:

Hr. Engleton advised me that they had ceased use of their wells for potable purposes, and were utilizing public water supply (Elizabethtomn Water Company). He further advised that all sanitary hewage on site was directed to the Borough of Manville for treatment, and that all industrial wastewaters were directed to the Somerset-Paritan Yalley Sawarage Authority for treatment. Both of these gentlemen then took me on a tour of the plant grounds.

Following are items of interest which I noted during our inspection:

- The large main building is comprised of administrative offices and two research wings; all wastewaters are handled as discussed in the preceding paragraph.
- 2) Several other buildings are utilized as varehouses; there are no industrial wastewaters generated at these locations; sacitary wastewaters are handled as described in the preceding paragraph.
- 3) There is one medium sized building utilized for processing various glues and resins. The sanitary needs of the building are served by one bathroom, containing a sink and toilet, from which flows are directed into a septic system. All other water used within the building is directed to a concrete neutralization pit outside the building, and thence to the Somerset-Raritan Valley Sewerage Authority. The integrity of this pretreatment pit did not appear to be suspect.
- 4) One outside chesical storage area is maintained onsite, towards the rear of the property. There were only a few drums being stored at the time of my inspection (avaiting removal via the manifest system) and there was no evidence of past spillages. General housekeeping at the entire facility appeared to be excellent.

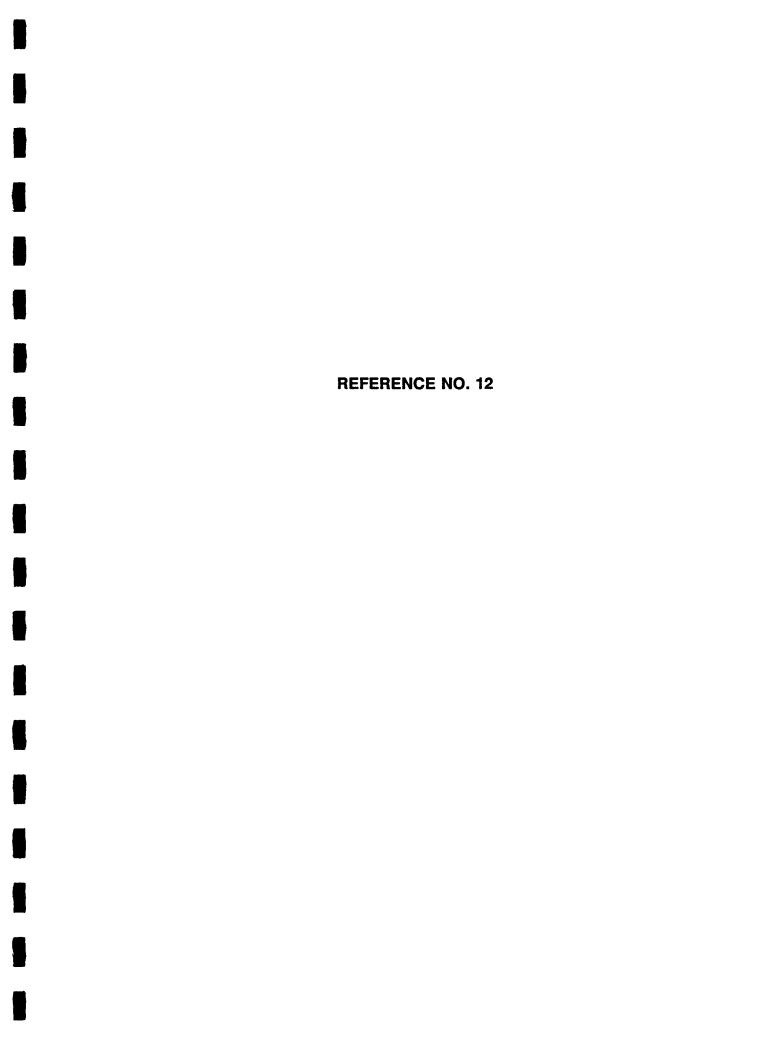
5) When National Starch acquired this property from Johns Manville, they were advised of the existence of a chemical waste dump which was established in 1954 by Johns Manville. In the spring of this year, National Starch voluntarily decided to locate, excavate, and dispose of the materials in that dump.

I was shown photographs and documents regarding these actions. The waste materials were disposed of in a remarkably secure fashion, which has apparently withstood the test of time. Containers of the waste materials were packed with dirt in cement pipes which were then carefully buried in a clay lined pit, stabilized with suitable fill, and covered with an impervious top. Hational Starch reports that all containers were intact upon excavation and there was no evidence of soil contamination. These materials were removed via the manifest system, under the direction of the Eureau of Hazardous Waste, and National Starch has agreed to send me copies of the pertinent documentation.

In conclusion, my inspection did not indicate any obvious sources currently existing on National Starch's property, and the firm's operations on this site appear to be conducted in an environmentally conscious and secure fashion.

E34101

cc: Gregory Cunningham, Enforcement Unit, Region IV William Althoff, Bureau of Ground Water Management Robert Tucker, Office of Cancer & Toxic Substances Richard Martini, Bridgemeter Township Health Department



MALCOLM PIRNIE, INC. PROJECT NOTES

To:File	Date:August 5, 1993
From:Andrew Clibanoff	Project #:8003-053
Subject:Manifests Documenting Site Waste Removals	Site Name:National Starch and Chemical Corporation

Ms. Donna van Veldhuisen of the Site Assessment Section, Bureau of Field Operations, NJDEPE, was able upon request to provide manifests that document the shipment of wastes from National Starch and Chemical Corporation to various Treatment, Storage, and Disposal (TSD) Facilities located in Niagara Falls, NY, Mt. Olive, NJ, and Morris Plains, NJ. The waste materials were shipped in May, 1991 according to the manifests. The manifest copies are of poor quality and it appears that the information may not be complete. However, the manifest copies attached to this project note are of the best quality available.

Chemical content information in the manifests is broken down into waste characteristic categories such as corrosive liquids, alkaline liquids, hazardous waste solids, flammable liquids, etc. No indication of any specific constituent contained in the shipped wastes is noted in the manifests with the exception of nitric acid. The actual quantity of nitric acid removed from the site is unclear.

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H	production for transportation according to the applicable regulations of the Department of Transportation, described, marked and labelled and are in the consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a FERRATORIS OF ACCEPT ADDRESS OF ACCEPT OF ACCEPT.
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REFERENCE NO. 13

MALCOLM PIRNIE, INC.	PROJECT NOTES
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To:File	Date:August 5, 1993
From:Andrew Clibanoff	Project #:8003-053
Subject:Results of File Searches	Site Name:National Starch and Chemical Corporation

Numerous attempts to find additional documentation concerning the waste dump at the National Starch and Chemical Corporation (NSCC) site have been made, but no more information above what Ms. Donna van Veldhuisen, NJDEPE, supplied could be located.

A Department-wide request for access to NSCC's files was made to the NJDEPE's Office of Legal Affairs in April, 1993. A file search in NJDEPE's Central File room on State Street in Trenton was conducted on May 21, 1993. The Bureaus of Hazardous Waste Engineering (BHWE), Advisement & Manifest (BAM), as well as the Manifest Section were reported by NJDEPE to also possess NSCC site files. Finally, a file search was conducted at the Bridgewater Township Department of Health (DOH) on July 9, 1993.

Information obtained during the Central File file review pertained mainly to a New Jersey Pollutant Discharge Elimination System-Discharge to Groundwater (NJPDES-DGW) Permit (NO. NJ0032506). The permit allowed for the treatment in a lined treatment unit of soil contaminated with No. 2 fuel oil from two leaking underground storage tanks (USTs). The permit was issued on August 31, 1987. The types of wastes associated with this permit fall within the parameters of the petroleum exclusion definition.

The BHWE was visited on June 25, 1993 at their Ewing office on 33 Arctic Parkway. The NSCC site file at the BHWE contained mainly financial statements for the corporation. The BAM sent computer records of manifests documenting shipments made from NSCC to various Treatment, Storage and Disposal (TSD) Facilities. The sheets that show shipments that correspond with the removal dates (May - June, 1981) are included in this reference. These manifest records do not identify individual hazardous substances that were sent to the TSD facilities. No useful information was found in the site file contained in the Manifest Section.

The Bridgewater Township DOH file search failed to yield any new useful information. The DOH file contained permit information and numerous Compliance Evaluation Inspection Reports, most of which were given ACCEPTABLE ratings. Violations indicated in some of the reports were for exceeding Chemical Oxygen Demand (COD) permit limits. The DOH also had information about some of the products that NSCC manufactures.



State of New Jersey Department of Environmental Protection and Energy

Environmental Regulation Hazardous Waste Regulation Program CN 421 Trenton, NJ 08625-0421 Phone# 609-633-1418

Frank Coolick

Administrator

Scott A. Weiner Commissioner

> Reference Number: 930504-10 Dr. Dennis Stainken Malcolm Pirnie

MAY 0 6 1993

Malcolm Pirnie 104 Interchange Plaza Cranbury, NJ 08512-9543

RE: National Starch & Chemical aka Johns-Manville Co., 10 Finderne Ave., Bridgewater, NJ

Dear Dr. Stainken:

This letter is to acknowledge that the Hazardous Waste Regulation Program is in receipt of your Freedom of Information (FOI) request addressed to the Office of Legal Affairs and the Central File Room regarding the above-referenced site. Your April 20, 1993 correspondence has been referred to me and other Information Officers within the Department for a Department-wide response.

Please be advised that in order to ensure a more comprehensive response within the Hazardous Waste Regulation Program (HWRP), your request is being processed and distributed to all of our Record Custodians who potentially have files on the aforementioned subject matter.

Upon receiving their responses, I will be able to answer your request by providing you with the names of our Record Custodians who actually have a file on the above-referenced site. Pursuant to our Hazardous Waste Regulations, N.J.A.C. 7:26-17.4(g), this answer shall be processed and provided to you within twenty (20) working days from the date of this acknowledgement letter. Your request has been given the above HWR reference number and you will need to use this number when you contact the Record Custodian. Please be aware that I am only responsible for the HWRP; and therefore, if you have questions regarding other Divisions/Programs, you will need to contact the appropriate Information Officer.

General Freedom of Information requests should continue to be made in writing and addressed to the Office of Legal Affairs (Central File Room). However, in the future please send these requests directly to the attention of Ida Marie Engelhardt at the following address: 401 East State Street, 4th Floor, CN-402, Trenton, New Jersey 08625.

If I may be of any further assistance, please feel free to contact me at (609) 633-1418.

Very truly yours,

Achia Armitage of Lita Hornton Rita L. Thornton, Information Officer Hazardous Waste Regulation Program

RLT/ab1



State of New Jersey Department of Environmental Protection and Energy

Environmental Regulation Hazardous Waste Regulation Program CN 421 Trenton, NJ 08625-0421 Phone# 609-633-1418

Frank Coolick Administrator

Scott A. Weiner Commissioner

Reference Number: 930504-10

MAY 25 1993

Dr. Dennis Stainken Malcolm Pirnie 104 Interchange Plaza Cranbury, NJ 08512-9543

RE: National Starch & Chemical aka Johns-Manville Co., 10 Finderne Ave., Bridgewater, NJ

Dear Dr. Stainken:

Please be informed that the following Bureaus and Record Custodians have a file on the above subject matter and/or reference site:

Ms. Lauri McGaughran Bureau of Advisement & Manifest (609) 292-8341

Mr. Anthony Drummings
Bureau of Hazardous Waste Engineering
(609) 292-9880

Ms. Aneeta Sukheja Manifest Section (609) 292-7081

If you would like to review or discuss these files, please contact the appropriate Record Custodians listed above. However, for internal tracking purposes, you will not be able to obtain information from these Custodians without using the above reference number which is only valid for the above referenced site.

Thank you for your cooperation.

Rita L. Thornton, Information Officer Hazardous Waste Regulation Program

RLT/ab1



State of New Jersey Department of Environmental Protection and Energy

Environmental Regulation Hazardous Waste Regulation Program CN 421 Trenton, NJ 08625-0421 Phone# 609-633-1418

Scott A. Weiner Commissioner

Frank Coolick Administrator

JUN 25 1993

Response To Request For Information

Dear Mr. Stawken:

In response to your recent information request, we are happy to forward the enclosed information.

If you should have any questions regarding this information or if you should need further assistance, please feel free to call Ferniamo at (609) 292-7081.

Very truly yours,

Minie Birder

Norine Binder, Acting Bureau Chief Bureau of Advisement and Manifest

PR12:dlv

06/22/93

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT

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WASTE MANIFESTS FROM 01/01/80 TO 12/31/87 FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

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GENERATOR	TSDF	MANIFEST	DATE Shipped	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230	ADVANCED ENVIRONMENTAL TECH 520 SPEEDWELL AVENUE MORRIS PLAINS , NJ NJD080631369	NJA0383766	11/10/87	D002 X940	CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF CORROSIVITY POISON/PESTICIDE,NOS SELENIUM	1360 P 140 P 400 P 10 P
				D007	CHROMIUM	10 P
		NJA0388525	12/08/87	D001 F003 D001 D001 D002 D002 X940	NON HAL SOLV & STLBTM	180 P 180 P 1040 P 80 P 10 P 240 P 20 P 60 P 140 P
		NJ00000219	06/15/81	X910	CHEMICAL PROCESS-SOLID, NOS	1250 P
	·	NJ00000220	06/26/81	D002	CHARACTERISTIC OF IGNITABILITY CHEMICAL PROCESS-LIQUID,NOS CHARACTERISTIC OF CORROSIVITY CHEMICAL PROCESS-SOLID,NOS	450 P 300 P
		NJ00000562	05/21/81	X940	CHARACTERISTIC OF CORROSIVITY POISON/PESTICIDE,NOS CHEMICAL PROCESS-SOLID,NOS CHARACTERISTIC OF IGNITABILITY	35 G 10 G 10 G 40 P 1 G 1 G
	-	NJ00000564	05/21/81	D003 X910	CHARACTERISTIC OF REACTIVITY CHEMICAL PROCESS-SOLID,NOS	1 P 800 P
	-	NJ00053885		D001 D002 D002 X940 D002		300 P 2 G 450 P 300 P 30 P 10 P
	- -	NJ00053886	07/21/83	D001 D002 D002 X940 D002		356 P 174 P 89 P 59 P 935 P 100 P

HWR1531 06/22/93

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT

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WASTE MANIFESTS FROM 01/01/80 TO 12/31/87

	FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S						
GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY	
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230	ADVANCED ENVIRONMENTAL TECH 520 SPEEDWELL AVENUE MORRIS PLAINS , NJ NJD080631369	NJ00067027	02/22/83	D001 D001 D002	CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF CORROSIVITY POISON/PESTICIDE,NOS	872 P 17 P 35 P 594 P 140 P 92 P	
		NJ00067034	06/30/81	D002 D002 D002 D002 D003	CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF REACTIVITY	125 G 75 G 6 G 1 G	
		NJ00099454	02/23/82	X850	PACKED LABORATORY CHEMICALS	450 P	
	·	NJ00117978	07/21/83	F002	SPT HAL SOLV&STLBTM OF DEGREAS	98 P	
	·	NJ00190577	10/27/83	D001 D001	CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY	15 P 2 P	
	•	NJ00227337	07/31/84	D001	CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY OIL/MT/ WRK,TURBN,DESEL,QUENCH	200 P 200 P 1600 P	
	·	NJ00239969	09/18/84		NO LINE ITEMS FOR THIS MANIFEST		
	AMERICAN INDUSTRIAL WASTE CO INDUSTRIAL DRIVE WHITE BLUFF , TN TND980729305	NJA0174554	03/11/86	X387 X387	•	26390 P 120 P 1050 P 1850 P	
	B & L CORP 472 FRELINGHUYSEN AVE NEWARK , NJ NJD064981988	NJA0374682	10/13/87	X722	WAST OIL/BTM RES/COMM TANK CLN	584 G	
	-	NJA0390016	12/11/87	X722	WAST OIL/BTM RES/COMM TANK CLN	1178 G	
	_						

NJ00053888 02/23/83 X722 WAST OIL/BTM RES/COMM TANK CLN

HWR1531 06/22/93

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS-WASTE MANAGEMENT

PAGE 10

WASTE MANIFESTS FROM 01/01/80 TO 12/31/87 FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR

TSDF

DATE WASTE MANIFEST SHIPPED CODE

WASTE NAME

QUANTITY

NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230 CECOS INTERNATIONAL INC 56TH ST & PINE AVE NIAGARA FALLS , NY NYDO80336241

NJ00000561	05/21/81	X910	CHEMICAL PROCESS-SOLID, NOS	35000 P
NJ00000563	05/21/81	X910	CHEMICAL PROCESS-SOLID, NOS	37000 P
NJ00000565	07/21/83	D001	CHARACTERISTIC OF IGNITABILITY	13400 P
NJ00053884	02/22/82	D001 F001 D002 X850	CHARACTERISTIC OF IGNITABILITY SPT HAL SOLV&SLUDG DEGREAS OPE CHARACTERISTIC OF CORROSIVITY PACKED LABORATORY CHEMICALS	10650 P 150 P 150 P 150 P
NJ00117209	03/11/83	D001 X910	CHARACTERISTIC OF IGNITABILITY CHEMICAL PROCESS-SOLID, NOS	7150 P 300 P
NJ00131522	03/17/83	X387	POLYCHLORINATED BIPHENYL,N O S	90 P
NJ00131841	09/20/82	D001 D001 D002 D002 X940 F002	CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF CORROSIVITY POISON/PESTICIDE,NOS SPT HAL SOLV&STLBTM OF DEGREAS	78 P 249 P 98 P 87 P 25 P 113 P
NJ00131842	09/20/82	X850 D001	PACKED LABORATORY CHEMICALS CHARACTERISTIC OF IGNITABILITY	292 P 5320 P
NJ00166651	10/27/83	D002 X940 X850	CHARACTERISTIC OF CORROSIVITY POISON/PESTICIDE, NOS PACKED LABORATORY CHEMICALS	166 P 207 P 1900 P
NJ00190579	10/27/83	D001 D001 D002 D001 D001 D002	CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF CORROSIVITY	7800 P 397 P 672 P 436 P 78 P 131 P
NJ00205096	03/02/84	D001 D001 D001 D002 D002 X850	CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF IGNITABILITY CHARACTERISTIC OF CORROSIVITY CHARACTERISTIC OF CORROSIVITY PACKED LABORATORY CHEMICALS	3974 P 315 P 82 P 543 P 114 P 197 P
NJ00205161	03/02/84	X940	POISON/PESTICIDE, NOS	70 P
NJ00227338	07/31/84	D001	CHARACTERISTIC OF IGNITABILITY	11400 P

REFERENCE NO. 14



INTEROFFICE CORRESPONDENCE

To:

John Rieckhoff

Date: July 30, 1993

From:

Andrew Clibanoff

Re:

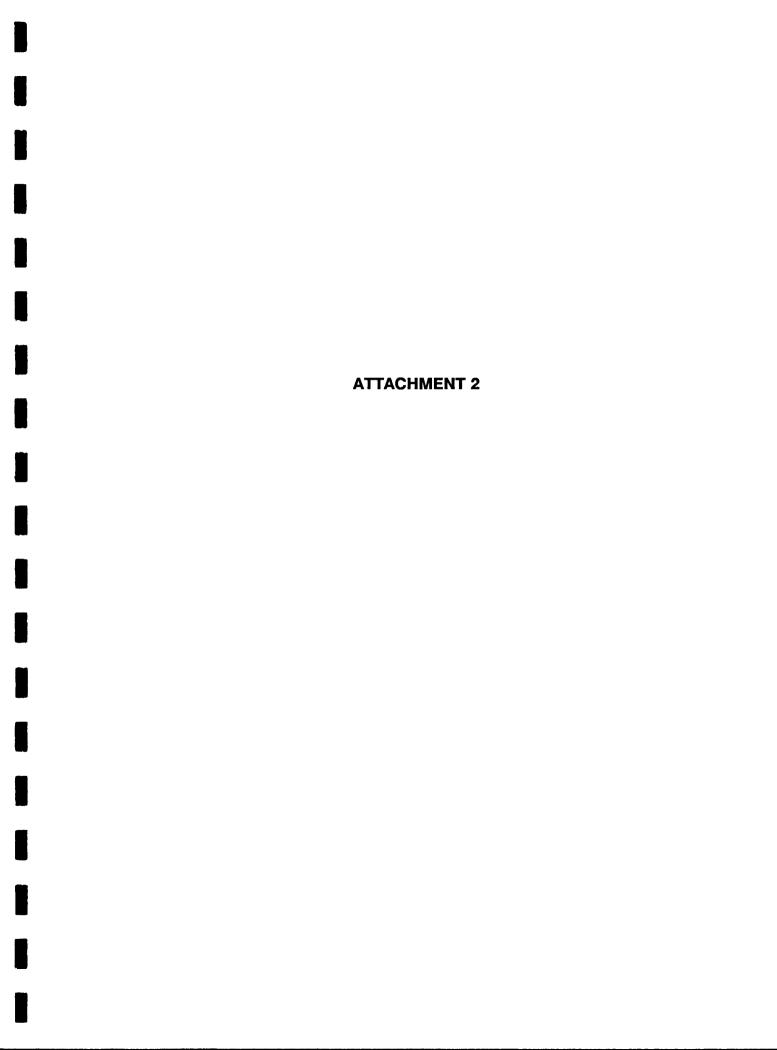
National Starch and Chemical Corporation Site Status

National Starch and Chemical Corporation (NSCC) is an Environmental Priorities Initiative - Preliminary Assessment (EPI-PA) Report that was prepared as a letter report and submitted to EPA in September, 1992. The New Jersey Department of Environmental Protection and Energy (NJDEPE) informed the EPA by letter that a former chemical dump area used by Johns-Manville (former owners of the NSCC property) was not addressed in the EPI-PA report. Containers of waste materials were packed with dirt in cement pipes which were then buried in a clay lined pit, stabilized with suitable fill, and covered with an impervious top.

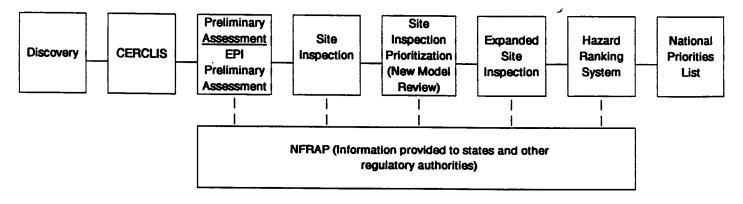
The contaminants in the dump were removed from the site and were transported to proper off-site disposal areas via the State manifest system when NSCC purchased the property in 1981. NSCC reported that all containers were intact upon excavation and there was no evidence of soil contamination. The manifests classified the removed materials into categories such as corrosive, alkaline, hazardous waste solids, etc. The material was not sampled for TCL or TAL constituents.

File searches have been conducted at the NJDEPE in Trenton, NJ, and also at the Bridgewater Township Health Department to gather more information on the dump area. No new useful information was discovered during these searches.

The available documentation indicates that the removal of wastes from the dump area is a qualified removal as defined by EPA. Residual soil contamination in the remaining soils in the dump area vicinity is not suspected as the cement pipes containing the wastes were intact at the time of removal. Therefore, it is recommended that this historical waste source not be further evaluated and that the submitted EPI-PA letter report be allowed to stand as is.



SUPERFUND SITE ASSESSMENT PROGRAM



SITE ASSESSMENT REPORTS

1. PRELIMINARY ASSESSMENT

- Quick Review of Readily Accessible Records and Reports
- * Undertaken to Determine the Existence of a Problem and the Need for Further Action at a Site by Characterizing:
 - Magnitude of the Hazard
 - Source and Nature of the Release or Potential Release
 - Identification of Targets
- * Does Not Include Sample Collection

2. SITE INSPECTION

- * The Purpose of the Site Inspection is to:
 - Further Define and Characterize the Problem
 - Provide Data for the Hazard Ranking System (HRS) Scoring and Compute Initial Score
 - Identification of Targets
 - Determine the Necessity of Further Action
- * The Site Inspection Involves an On-Site Visit and Sampling (10+/- Samples)
- * A Site Inspection is not an Extent of Contamination Study

3. SITE INSPECTION PRIORITIZATION

- * Quick Review of Readily Accessible Records and Reports
- * Undertaken to Determine the Validity and Update Background Conditions Under the New HRS Model, and the Need for Further Action at a Site by Characterizing:
 - Magnitude of the Hazard
 - Source and Nature of the Release or Potential Release
- * Included On-Site Visits or Sample Collection as needed
 - Analyze Samples/Limited Analytical Resources
 - Account for Significant Safety Hazards On-Site

4. EXPANDED SITE INSPECTION

A Follow-Up Inspection May Be Recommended After the SI To:

- * Gather Additional Data Necessary to Strengthen or Substantiate the Initial HRS Score
 - Geophysical Surveys
 - Installation of Groundwater Monitoring Wells
 - Additional Sampling

Review of Analytical Data

If previous analytical data are available, they should be reviewed for information which supports the design of the sampling and analysis program, tests site hypotheses, and documents the site score. The SI investigator should review all previous analytical data. While analytical data collected for other purposes may not meet SI objectives, site-specific analytical data are generally helpful in better understanding the nature of the problem at the site, regardless of data sources or data quality. The depth of the review depends on the overall quality and quantity of data, the intended use of the data, and whether they are representative of current site conditions and comparable to SI data. Determining whether available data can be applied as SI-generated data requires the professional judgement of an experienced reviewer. Both validated and non-validated analytical data may be available. Previous SI data will be validated and of CLP-quality. Non-validated data may contain false positives and false negatives, as well as quantitation, transcription, and calculation errors. If data of unknown or questionable quality are used for decision-making, the investigator should review all available information to assess the level of certainty associated with the data. If these data are used for HRS documentation, data validation will be necessary. The investigator should be able to determine the general quality of the data set by reviewing QC data for evaluation under the Superfund Program.